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*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:

*Jaylynn Dean v. Uber Technologies,  
Inc., et al., No. 3:23-cv-06708*

Case No. 3:23-md-03084-CRB

**DECLARATION OF DANIEL  
CUMMINGS IN SUPPORT OF  
DEFENDANTS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE FILED UNDER SEAL**

Judge: Hon. Charles R. Breyer  
Courtroom: Courtroom 6 – 17th Floor

I, Daniel Cummings, declare:

1. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, “Uber”). I am a member in good standing of the Bars of the States of Missouri, Kansas, and Nebraska. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC’s Administrative Motion to Consider Whether Another Party’s Materials Should Be Filed Under Seal.

Because the materials at issue were designated confidential by Plaintiffs, Defendants filed the following under seal:

Document	Description	Designating Party
<b>Exhibit 6 to Defendants’ Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of expert report of Bruce Weiner dated September 26, 2025, marked as Confidential.	Plaintiffs
<b>Exhibit 9 to Defendants’ Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of transcript of July 22, 2025 deposition of Scott McLaughlin, marked as Highly Confidential – Attorneys’ Eyes Only.	Plaintiffs
<b>Exhibit 10 to Defendants’ Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Tempe Police Department records Bates stamped as JDean-TempePD-000001-25 and marked as Confidential – Attorney Eyes Only	Plaintiffs
<b>Exhibit 20 to Defendants’ Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of expert report of Veronique Valliere dated September 26, 2025, marked as Confidential	Plaintiffs
<b>Exhibit 21 to Defendants’ Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of Appendix D of expert report of Lacey R. Keller dated September 26, 2025, marked as Confidential	Plaintiffs

2. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 10<sup>th</sup> day of November, 2025.

/s/ Daniel Cummings

# Daniel Cummings